

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

HEATHER NELSON,

Plaintiff,

v.

**SANTANDER CONSUMER USA, INC.,
PATRICK K. WILLIS CO., INC., d/b/a/
AMERICAN RECOVERY SERVICE, and
ASSETSBIZ CORP., d/b/a ABC
RECOVERY,**

Defendants,

SANTANDER CONSUMER USA, INC.,

Counter-Plaintiff,

v.

HEATHER NELSON,

Counter-Defendant.

Case No.: 11-cv-307

**PLAINTIFF'S PROPOSED VOIR DIRE
QUESTIONS**

Plaintiff, Heather Nelson, proposes the Court ask the following questions for voir dire.

Plaintiff's Requested Voir Dire Question Number 1:

Are any of you or have any of you been engaged in or employed by a business or collection agency which collects debts, or who have family members or close friends who are so employed?

Plaintiff's Requested Voir Dire Question Number 2:

Are any of you now, or have any of you ever been, engaged in or employed by a business or individual who refers accounts to a debt collector for collection, or do you have family members or close friends who have ever been so employed?

Plaintiff's Requested Voir Dire Question Number 3:

Are any of you now, or have any of you ever been, engaged in or employed by a business or individual which extends or collects credit, like a bank, credit union, or finance company, or do you have family members or close friends who have ever been so employed?

Plaintiff's Requested Voir Dire Question Number 4:

Are any of you now, or have any of you ever been, engaged in or employed by a business or individual which is involved in the business of repossessing vehicles, or do you have family members or close friends who have ever been so employed?

Plaintiff's Requested Voir Dire Question Number 5:

Would any of you be unable or unwilling to award damages to someone who has suffered emotional distress or mental anguish?

Plaintiff's Requested Voir Dire Question Number 6:

Would any of you be unable or unwilling to award punitive damages if the evidence showed a basis for them?

Plaintiff's Requested Voir Dire Question Number 7:

Is there anyone here that believes a debt collector does not have to treat a person with respect and dignity just because that person might owe money to the debt collector?

Plaintiff's Requested Voir Dire Question Number 8:

Have any of you ever owned a business? If yes, briefly describe the size and type of business.

Dated this 10th day of May, 2013.

s/ Ivan Hannibal
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